

# **EXHIBIT F**

## **PLAINTIFFS' DRAFT 30(b)(6) NOTICE**

**From:** Jeffrey Freeman <jfreeman@kytrial.com>  
**Sent:** Friday, July 14, 2023 3:32 PM  
**To:** Carter, J. Kenneth; Alan Belcher; Goddard, Mark B.; hmetcalfe\_malawfirmsc.com; Close, L. Grant III; Cluverius, Jennifer S.; Bowman, Theresa; vgurvits@bostonlawgroup.com; frank@bostonlawgroup.com; Jeffrey Freeman; Shellie Fischer; Cassy Young; Joseph Rahimi; evan@cfwlegal.com; Thomas Barrow; Wes Few; Cooper Ellenberg; Steinberg, David; J Edward Bell; Tyler Thompson; Liz Shepherd; Dani Pinter; Benjamin Bull; Peter Gentala; Christen Price; Joshua Salley; Kathy Kennedy; John Hubert; Casonya Ritchie [EXTERNAL] Mindgeek / Hammy depositions; Does v Mindgeek et al  
**Subject:** NOTICE OF 30B5-6 DEPOSITION - MG FREESITES.docx; NOTICE OF 30B5-6 DEPOSITION - HAMMY MEDIA.docx  
**Attachments:**

-EXTERNAL MESSAGE-

Counsel – Plaintiffs would like to proceed to schedule 30b5/6 depositions for representatives of MindGeek and Hammy Media to occur within the next 30 days. Draft copies of notices are attached which will describe the topics and scope. Please respond with available dates for the appropriate representatives by July 19<sup>th</sup>.

**Jeffrey L. Freeman**

Dolt, Thompson, Shepherd & Conway, PSC  
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NOTICE: This e-mail and any attachment is an Electronic Communication within the meaning of the Electronic Communications Privacy Act (18 U.S.C. § 2510) and may contain attorney-client and/or work product privileged material. This e-mail is intended only for the addressee(s) to whom specifically directed. If you receive this in error, no waiver of any privilege or permission or authority to use any portion of this e-mail or any attachment is intended or may be inferred. Please contact the undersigned as listed above to receive instructions on how to deal with the unintended e-mail. No attorney-client relationship is formed by receipt of this e-mail.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

JANE DOES 1-9,

Plaintiffs,

vs.

**COLLINS MURPHY, SHARON  
HAMMONDS, BRENDA F. WATKINS,  
LIMESTONE UNIVERSITY, MG  
FREESITES, LTD., d/b/a  
PORNHUB.COM, MG FREESITES II  
LTD., MINDGEEK S.A.R.L.,  
MINDGEEK USA, INC., MG  
BILLING LTD., and HAMMY MEDIA  
LTD. d/b/a XHAMSTER.COM,  
TRAFFICSTARS LTD., WISEBITS  
LTD, XHAMSTER IP HOLDINGS  
LTD, WISEBITS IP LTD.,**

Defendants.

C/A No. 7:20-CV-00947-DCC

**PLAINTIFF'S NOTICE OF  
30(b)(5) and 30(b)(6) DEPOSITION**

**TO: MARC E. MAYER, ESQ. and MARK GODDARD, ESQ., COUNSEL FOR  
DEFENDANTS MG FREESITES, LTD., MINDGEEK S.A.R.L., MINDGEEK USA, INC.,  
MG BILLING LTD.**

YOU WILL PLEASE TAKE NOTICE that the Plaintiffs' attorney, pursuant to Rule 30(b)(5) and 30(b)(6) of the Federal Rules of Civil Procedure, will take the deposition(s) of a MG Freesites, LTD.'s (hereinafter "MindGeek") officer, director, employee, agent and/or other representative who shall be designated to testify on behalf of MindGeek regarding all information known or reasonably available with respect to the subject matters identified in Exhibit "A.".

Plaintiffs request that MindGeek provide written notice, at least five (5) business days before the deposition(s), of the name(s) and employment position(s) of the individuals designated to testify on behalf of Pornhub, at the time and place set forth hereinafter.

**DATE:**

**TIME:** 11:00 AM (EST)

**PLACE:** Via Zoom

**COURT REPORTER:** Southern Reporting

PLEASE TAKE FURTHER NOTICE that pursuant to Fed. R. Civ. Pro. 34, where requested, the person or persons so designated are required to produce copies of all correspondence, reports, records, writings, or other documentation as requested in Exhibit "A"

Counsel for the Plaintiff hereby identifies and reserves the right to use any and all documents produced or made available in discovery by either party during these depositions, and hereby gives notice of the intent to question the witness(s) regarding any and all documents produced or made available by either party during the court of discovery, as well as those obtained pursuant to subpoena, FIOA, or records request.

The individuals designated will testify on behalf of the Defendants at the time and place set forth hereinafter, upon oral examination (via stenography an/or video) before a Notary Public or any other officer authorized by law to take depositions at which time you are notified to appear and take part in such examination regarding the following issues:

**Exhibit "A"**

**DEFINITIONS:**

**User:** A "user" is an individual or entity who accesses a specified website or domain that is owned, operated, controlled, or affiliated with MindGeek, or any related brand or entity, including Pornhub.com, for the purposes of viewing, downloading or uploading video content.

**User Account:** A User Account is comprised of a username, password and any information related to a user who registers with a specific website or domain owned, operated, controlled, or affiliated

with MindGeek, or any related brand or entity. For example, those who produce and upload content for/by Pornhub.com utilize a User Account. This includes accounts that are “verified” and “unverified” by Pornhub.com or accounts required to be registered with any website owned, operated, controlled, or affiliated with MindGeek, or any related brand or entity, including Pornhub.com.

**Moderator:** Content moderators review and analyze content found on platforms and decide, based on a predetermined set of rules and guidelines as well as the law, whether video content should be made available for users to view or download.

**Algorithm:** an ordered set of instructions recursively applied to transform data input into processed data output, as a mathematical solution, descriptive statistics, internet search engine result, or predictive text suggestions.

**Relevant Time Period:** The time period beginning in 2012 when videos depicting the Plaintiffs were first uploaded or made available for viewing by users to the present. Unless otherwise specifically stated, subject matter designations include all operations during the Relevant Time Period.

**Content Curation:** Any process, whether automated or manual, intended to categorize or sort content for the purposes of tailoring to a user’s individual preferences or for the purposes of filtering content into specialized categories.

## **SUBJECT MATTER**

1. Please be prepared to describe and discuss the corporate structure and relationship between MG Freesites, LTD and any and all affiliates, parents, subsidiaries, contractors, or agents, along with the primary ownership and / or board of directors of all such entities; to include the Mind Geek Corporate Organizational chart and descriptions of each division’s role in the overall MindGeek umbrella. This includes, but is not limited to, the names, contact

information, and addresses for all employees that maintain a leadership role within the

organization at any time during the Relevant Time Period, and number of total employees for each MindGeek entity.

2. Please be prepared to identify and discuss all websites, domains, and brands owned, operated, managed, or hosted by any MindGeek company, subsidiary, parent, contractor, or agents that were accessible by public internet connection during the Relevant Time Period
3. Discuss organizational financial cash flow structure, including payments to content partners or providers, verified users, ad revenue tracking, revenue streams, ad sales, and membership payment processing for all MindGeek websites and domains active during the Relevant Time Period.
4. Please identify and discuss, in detail, the content data storage and management utilized by MindGeek. This includes, but is not limited to, the names, contact information, and addresses of the individuals working within the department(s) that control content storage and management during the Relevant Time Period, whether or not they are still employed by MindGeek.
5. Knowledge of the metrics of site traffic for all MindGeek websites and domains, including sever locations and archive data storage location and capacity, what user demographics are collected and monitored and where and how records of this information is stored.
6. For the Relevant Time Period, identify and discuss all systems and procedures through which content and potential content passes from the time of upload or other transmission to MindGeek until content is made available for viewing on any MindGeek website, including the identity of the department titles and persons responsible for management of these operations.

7. Please identify and discuss, in detail, the monitoring of “User Accounts” and/or the process of monitoring “User Accounts” during the Relevant Time Period. This includes, but is not limited to, the names, contact information, and addresses for all of the individuals working within the department that oversees “User Accounts” whether or not they are currently employed by MindGeek.
8. For the Relevant Time Period, identify and describe all instances, programs, or agreements for content sharing or sales between any MindGeek affiliated websites, as well as between any MindGeek affiliated entities and any other unaffiliated individuals or entities.
9. Please identify all individuals or departments within the MindGeek organization or with whom MindGeek has contracted to provide support, assistance, services for analytics used in demographic marketing, search engine optimization and geolocation and explain MindGeek’s use of the information obtained through collection of that analytic information.
10. Please identify and discuss, in detail, the content moderation protocol and procedure during the Relevant Time Period, to include number of employees within the content moderating department and what each of their roles were. This includes, but is not limited to, the names, contact information, and addresses of all current and previously employed moderators.
11. Please identify and discuss, in detail, the monetization structure and incentives offered to any user, including Pornhub.com users, in connection with the upload, advertisement, sale, or viewing of content. This includes, but is not limited to, the names, contact information, and address of the individuals who are tasked with making decisions regarding monetization.

12. Please identify and discuss, in detail, the algorithms and methods used to improve search engine optimization (“SEO”), to curate content for users, and to increase views of content and advertisements on MindGeek sites, including Pornhub.com. This includes, but is not limited to, the names, contact information, and addresses of all the individuals responsible for developing, designing, and managing the algorithms utilized by MindGeek for such purposes.
13. Discuss and describe the complete history, evolution and current state of all organizational processes used in monitoring or screening content uploaded to any MindGeek site during the Relevant Time Period to ensure that content was in compliance with all legal requirements or stated policies of MindGeek, and that any individuals depicted in content consented to the distribution.
14. Discuss and describe the complete history during the Relevant Time Period of all methods, policies, and practices by which content is or was "tagged", categorized, titled or otherwise grouped or identified before it was made available to users.
15. Discuss and describe all processes, policies, procedures, or methods employed during the Relevant Time Period for monitoring comments left by viewers.
16. Please identify and discuss, in detail, the operational staff employed at MG Freesites LTD, including roles, description of daily tasks, and the extent to which any staff work product is used by or performed for any other MindGeek related entity.
17. All methods, procedures by which a content provider, member or other individual can, or could at any time since 2012, upload or download content from any site or server owned or controlled by MindGeek.
18. Please identify and describe in detail all analytic data collected on users, members, subscribers, or other viewers of content offered on MindGeek sites, and all ways in which

that data is obtained, stored and used.

19. Please identify and discuss, in detail, the content curation process; including, but not limited to, the names, contact information, and addresses of all the employees responsible for content curation during the Relevant Time Period and all methods, including algorithms or other automated processes, intended to provide users with content tailored to individual preferences.
20. Discuss and describe the history and evolution to present of any and all systems, policies, procedures, methods etc. for responding to complaints of illegal or non-consensual content or any request for "take-down" of specific content, as well as the metrics relating to "take down" requests and / or reports of illegal or non-consensual content from 2012 to present as well as MindGeek's response to such requests.
21. Discuss and describe the complete history of MindGeek's involvement, hosting, handling, communications (internal or external), disposition, or any other actions regarding the videos identified depicting any of the Plaintiffs in this action, including complaints and requests for removal of the videos.
22. Provide all information in MindGeek's possession relating to the PornHub verified user Lordfauger18, and any user identified as 'cwdistribution', along with any related accounts, including all user data, history, any payments made to, uploads made by, and any communications with these users, and the IP address of any computer accessing any MindGeek site under either user name.
23. For the Relevant Time Period, provide all information related to the TrafficJunky platform relating to the sale of advertisements on MindGeek websites, including the policies related to the types of ads and/or vendors that are permitted, the search terms, keywords, or tags advertisers can associate their ads with, the pricing structure, and the employees responsible for managing this platform and establishing these policies.

24. Provide relevant information on the location of all offices and employees (or positions) within the MindGeek organizational structure which are involved in any of the subject matter areas described herein.

PLEASE TAKE FURTHER NOTICE that these depositions are being taken for the purpose of discovery, for use at trial, and for all other purposes as we are permitted under the rules of this Court and all applicable statutes and laws.

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**BELL LEGAL GROUP, LLC**

s/J. Edward Bell, III

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**ATTORNEYS FOR PLAINTIFF**

Georgetown, SC  
September 22, 2022

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

JANE DOES 1-9,

Plaintiffs,

vs.

**COLLINS MURPHY, SHARON  
HAMMONDS, BRENDA F. WATKINS,  
LIMESTONE UNIVERSITY, MG  
FREESITES, LTD., d/b/a  
PORNHUB.COM, MG FREESITES II  
LTD., HAMMY MEDIA S.A.R.L.,  
HAMMY MEDIA USA, INC., MG  
BILLING LTD., and HAMMY MEDIA  
LTD. d/b/a XHAMSTER.COM,  
TRAFFICSTARS LTD., WISEBITS  
LTD, XHAMSTER IP HOLDINGS  
LTD, WISEBITS IP LTD.,**

Defendants.

C/A No. 7:20-CV-00947-DCC

**PLAINTIFF'S NOTICE OF  
30(b)(5) and 30(b)(6) DEPOSITION**

**TO: HANNAH METCALF, ESQ. AND EVAN FRAYWITZER, ESQ., Counsel for  
Defendant Hammy Media, Ltd.**

YOU WILL PLEASE TAKE NOTICE that the Plaintiffs' attorney, pursuant to Rule 30(b)(5) and 30(b)(6) of the Federal Rules of Civil Procedure, will take the deposition(s) of a Hammy Media, LTD.'s (hereinafter "Hammy Media") officer, director, employee, agent and/or other representative who shall be designated to testify on behalf of Hammy Media regarding all information known or reasonably available with respect to the subject matters identified in Exhibit "A".

Plaintiffs request that Hammy Media provide written notice, at least five (5) business days before the deposition(s), of the name(s) and employment position(s) of the individuals designated to testify on behalf of Pornhub, at the time and place set forth hereinafter.

**DATE:**

**TIME:** 11:00 AM (EST)

**PLACE:** Via Zoom

**COURT REPORTER:** Southern Reporting

PLEASE TAKE FURTHER NOTICE that pursuant to Fed. R. Civ. Pro. 34, where requested, the person or persons so designated are required to produce copies of all correspondence, reports, records, writings, or other documentation as requested in Exhibit "A"

Counsel for the Plaintiff hereby identifies and reserves the right to use any and all documents produced or made available in discovery by either party during these depositions, and hereby gives notice of the intent to question the witness(s) regarding any and all documents produced or made available by either party during the court of discovery, as well as those obtained pursuant to subpoena, FIOA, or records request.

The individuals designated will testify on behalf of the Defendants at the time and place set forth hereinafter, upon oral examination (via stenography an/or video) before a Notary Public or any other officer authorized by law to take depositions at which time you are notified to appear and take part in such examination regarding the following issues:

**Exhibit "A"**

**DEFINITIONS:**

**User:** A "user" is an individual or entity who accesses a specified website or domain that is owned, operated, controlled, or affiliated with Hammy Media, or any related brand or entity, including Pornhub.com, for the purposes of viewing, downloading or uploading video content.

**User Account:** A User Account is comprised of a username, password and any information related to a user who registers with a specific website or domain owned, operated, controlled, or affiliated

with Hammy Media, or any related brand or entity. For example, those who produce and upload content for/by xHamster.com utilize a User Account. This includes accounts that are “verified” and “unverified” by xHamster.com or accounts required to be registered with any website owned, operated, controlled, or affiliated with Hammy Media, or any related brand or entity, including xHamster.com.

**Moderator:** Content moderators review and analyze content found on platforms and decide, based on a predetermined set of rules and guidelines as well as the law, whether video content should be made available for users to view or download.

**Algorithm:** an ordered set of instructions recursively applied to transform data input into processed data output, as a mathematical solution, descriptive statistics, internet search engine result, or predictive text suggestions.

**Relevant Time Period:** The time period beginning in 2012 when videos depicting the Plaintiffs were first uploaded or made available for viewing by users to the present. Unless otherwise specifically stated, subject matter designations include all operations during the Relevant Time Period.

**Content Curation:** Any process, whether automated or manual, intended to categorize or sort content for the purposes of tailoring to a user’s individual preferences or for the purposes of filtering content into specialized categories.

## **SUBJECT MATTER**

1. Please be prepared to describe and discuss the corporate structure and relationship between Hammy Media, LTD and any and all affiliates, parents, subsidiaries, contractors, or agents, along with the primary ownership and / or board of directors of all such entities; to include the Hammy Media Corporate Organizational chart and descriptions of each division’s role in the overall Hammy Media umbrella. This includes, but is not limited to, the names,

contact information, and addresses for all employees that maintain a leadership role within the

organization at any time during the Relevant Time Period, and number of total employees for each Hammy Media entity.

2. Please be prepared to identify and discuss all websites, domains, and brands owned, operated, managed, or hosted by any Hammy Media company, subsidiary, parent, contractor, or agents that were accessible by public internet connection during the Relevant Time Period
3. Discuss organizational financial cash flow structure, including payments to content partners or providers, verified users, ad revenue tracking, revenue streams, ad sales, and membership payment processing for all Hammy Media websites and domains active during the Relevant Time Period.
4. Please identify and discuss, in detail, the content data storage and management utilized by Hammy Media. This includes, but is not limited to, the names, contact information, and addresses of the individuals working within the department(s) that control content storage and management during the Relevant Time Period, whether or not they are still employed by Hammy Media.
5. Knowledge of the metrics of site traffic for all Hammy Media websites and domains, including sever locations and archive data storage location and capacity, what user demographics are collected and monitored and where and how records of this information is stored.
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8. For the Relevant Time Period, identify and describe all instances, programs, or agreements for content sharing or sales between any Hammy Media affiliated websites, as well as between any Hammy Media affiliated entities and any other unaffiliated individuals or entities.
9. Please identify all individuals or departments within the Hammy Media organization or with whom Hammy Media has contracted to provide support, assistance, services for analytics used in demographic marketing, search engine optimization and geolocation and explain Hammy Media’s use of the information obtained through collection of that analytic information.
10. Please identify and discuss, in detail, the content moderation protocol and procedure during the Relevant Time Period, to include number of employees within the content moderating department and what each of their roles were. This includes, but is not limited to, the names, contact information, and addresses of all current and previously employed moderators.
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12. Please identify and discuss, in detail, the algorithms and methods used to improve search engine optimization (“SEO”), to curate content for users, and to increase views of content and advertisements on Hammy Media sites, including Pornhub.com. This includes, but is not limited to, the names, contact information, and addresses of all the individuals responsible for developing, designing, and managing the algorithms utilized by Hammy Media for such purposes.
13. Discuss and describe the complete history, evolution and current state of all organizational processes used in monitoring or screening content uploaded to any Hammy Media site during the Relevant Time Period to ensure that content was in compliance with all legal requirements or stated policies of Hammy Media, and that any individuals depicted in content consented to the distribution.
14. Discuss and describe the complete history during the Relevant Time Period of all methods, policies, and practices by which content is or was "tagged", categorized, titled or otherwise grouped or identified before it was made available to users.
15. Discuss and describe all processes, policies, procedures, or methods employed during the Relevant Time Period for monitoring comments left by viewers.
16. Please identify and discuss, in detail, the operational staff employed at Hammy Media, LTD, including roles, description of daily tasks, and the extent to which any staff work product is used by or performed for any other Hammy Media related entity.
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18. Please identify and describe in detail all analytic data collected on users, members, subscribers, or other viewers of content offered on Hammy Media sites, and all ways in

which that data is obtained, stored and used.

19. Please identify and discuss, in detail, the content curation process; including, but not limited to, the names, contact information, and addresses of all the employees responsible for content curation during the Relevant Time Period and all methods, including algorithms or other automated processes, intended to provide users with content tailored to individual preferences.
20. Discuss and describe the history and evolution to present of any and all systems, policies, procedures, methods etc. for responding to complaints of illegal or non-consensual content or any request for "take-down" of specific content, as well as the metrics relating to "take down" requests and / or reports of illegal or non-consensual content from 2012 to present as well as Hammy Media's response to such requests.
21. Discuss and describe the complete history of Hammy Media's involvement, hosting, handling, communications (internal or external), disposition, or any other actions regarding the videos identified depicting any of the Plaintiffs in this action, including complaints and requests for removal of the videos.
22. Provide all information in Hammy Media's possession relating to the xHamster verified user identified as 'cwdistribution', along with any related accounts, including all user data, history, any payments made to, uploads made by, and any communications with these users, and the IP address of any computer accessing any Hammy Media site under either user name.
23. For the Relevant Time Period, provide all information related to the TrafficStars platform relating to the sale of advertisements on Hammy Media websites, including the policies related to the types of ads and/or vendors that are permitted, the search terms, keywords, or tags advertisers can associate their ads with, the pricing structure, and the employees responsible for managing this platform and establishing these policies.

24. Provide relevant information on the location of all offices and employees (or positions) within the Hammy Media organizational structure which are involved in any of the subject matter areas described herein.

PLEASE TAKE FURTHER NOTICE that these depositions are being taken for the purpose of discovery, for use at trial, and for all other purposes as we are permitted under the rules of this Court and all applicable statutes and laws.

[SIGNATURE BLOCK ON FOLLOWING PAGE]

**BELL LEGAL GROUP, LLC**

s/J. Edward Bell, III

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**ATTORNEYS FOR PLAINTIFF**

Georgetown, SC

July 10, 2023